March 24, 2017

To: Ryan Fogle, EPA Manager, ENERGY STAR for IT and Data Center Products;
Matt Malinowski, ICF International

Re: **ITI Comments on ENERGY STAR Imaging Equipment Version 3.0**

Thank you for the opportunity to comment on the ENERGY STAR Imaging Equipment Version 3.0 Test Method Discussion Document. As the global voice of the tech sector, ITI has been a long-standing partner in the ENERGY STAR process. We look forward to continuing to collaborate and appreciate your consideration of our comments.

In general, ITI is concerned with the proposed timeframe for Version 3.0 development. As detailed in our comments below, any changes to test methods, paper usage assumptions and other areas will require detailed investigation and data collection from key stakeholders, and will thus take more time than the 1-2 months proposed by EPA. We strongly recommend an extended timeframe for this specification development process.

Summary of key issues:

1. **Network activity test method revision**

   It is not clear at this time that network activity can be accounted for in the TEC test method in a repeatable manner. Repeatability is critical to meaningful test results and the credibility of the program. ITI members are investigating a repeatable solution. The likely outcome may be specification of the type of computers to be used during testing, operating system, print driver, and a custom software tool to deliver a standard network prompt, cartridge level check, and simulate a second computer booting up during the sleep mode measurement.

   Note that the proposed change to the test method would force manufacturers to re-test all currently certified TEC models, which is a significant cost impact and time commitment. Also note that the original intent of the TEC approach was to provide for the ability to compare product models and not to represent real world usage.

   The proposed change would also impact 3rd party test labs that perform certification and audit testing, creating and additional burden for those parties in performing testing of Imaging Equipment.

ITI recommends that the EPA solicit input on this proposal from approved labs and certification bodies, particularly on the critical issue of repeatability.

2. WiFi Priority

ITI agrees that WIFI is often a higher usage connection than USB for models in the SOHO and SMB space in the US (this cannot be said for models outside North America or Europe). Therefore, it makes sense to move the WIFI connection above USB in Table 6. An appropriate wireless allowance should be provided for both OM and TEC products. However, for TEC products that have a wired ethernet connection, this connection continue to be the primary connection for our customers.

3. Paper Usage Assumptions

ITI agrees the current paper usage assumptions are outdated, and unrealistically high in most cases. Unrealistic paper assumptions negatively impact industry outside of the ENERGY STAR program, as policy makers consider life cycle assessment data that suggests TEC products use more energy than they actually do. ITI members are investigating appropriate changes to paper usage assumptions, which will take additional time. Note that changes to the number of jobs could be implemented through calculation with existing data while changes to the job size assumptions would require re-testing of currently certified products.

4. Maintenance Modes

ITI members believe the example provided in the ENERGY STAR Imaging Equipment Version 3.0 Launch Webinar Slides to be an extreme corner case. A typical inkjet printer runs a maintenance mode once only during initial installation (first usage) and another maintenance mode after an extended period of inactivity (e.g. after 10-20 days without printing). Duration of this maintenance mode is less than 1 minute and power level typically is less than 10W.

Typical maintenance and calibration modes for electrophotography printers occur at the beginning or end of print jobs and last < 1 minute. These modes are commonly set to repeat at set intervals of usage, meaning that they can occur any where between daily or significantly longer, depending on consumer behavior

Maintenance modes are crucial to the proper functioning of the equipment, print quality, and customer satisfaction. ITI members believe there is no need to address maintenance modes in the specification, and doing so would provide no additional value.

5. **Standby Definition and Requirement**

The proposed change would certainly hinder international harmonization and have negative impacts for industry, without really accomplishing anything. ITI members would like to limit confusion and keep the current definitions.

Additional information: The standby definition used in ENERGY STAR was inherited from FEMP's 1 W requirement. This was also used in IEC 62301:2005 and is a broad definition. In 2011, IEC 62301 split standby into 3 different definitions - Off, Standby and network standby. The IEC 62301:2011 definition of standby is not used in Imaging Equipment products. However, off and network standby are used in Imaging Equipment. The power limits and original definition in ENERGY STAR V2.0 align with calling this mode "Off" or "Plugged-In Off".

6. **Professional Products**

ITI requests EPA to make it more clear that the proposed professional product category is limited to TEC products only. Additionally, a new test method and limits would need to be set and will not fit in the time from of the 3.0 timeline, however, ITI companies would work with EPA and JEITA for inclusion in the next update.

7. **3D Printers**

ITI does not support the inclusion of 3D printers in the Imaging Equipment specification. 3D printers are not imaging equipment. The technology and stakeholders are completely different than this specification and would require their own unique ENERGY STAR specification. It would not be appropriate to include 3D printers in the imaging equipment specification.

8. **Scope Exclusions**

ITI encourages EPA to consider market penetration and not just a low participation rate for the products in question. Some of those products are primarily sold to institutional customers that require or expect the ENERGY STAR label. To exclude copiers would also be disruptive to other labels that require ENERGY STAR such as EPEAT.

9. **Refillable Ink Tanks**

ITI members believe the ENERGY STAR program and brand are best served by a focus on energy and energy efficiency. If the EPA is interested in encouraging these products, we recommend that the EPA do so in a program separate from ENERGY STAR.

10. **Maximum machine delay time**

    A maximum sleep mode delay time of 4 hours is standard for TEC products based on earlier ENERGY STAR requirements. We do not believe it is necessary for specify this value. In addition, Blue Angel, which many ENERGY STAR TEC models also achieve has specified limits for the maximum customer settable default delay time to sleep, so this is covered by other Eco Labels.

Please contact me if you have additional questions about our comments or would ike to schedule a meeting to discuss further.

Sincerely,

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